

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

03-00444
(Inmate Number)

Jervis LAVERN Goodrich
(Name of Plaintiff)

SNYDER COUNTY PRISON, 600 Old
(Address of Plaintiff)

COLONY Rd. SELINGROVE, PA
17870

vs.

PENNSYLVANIA STATE TROOPERS,

STEPHEN WILCOX. Badge # 7910

CHRISTOPHER SOO. Badge # 7649
(Names of Defendants)

4:CV 04-1603

(Case Number)

CIVIL
COMPLAINT

FILED
HARRISBURG, PA

JUL 22 2004

MARY E D'ANDREA, CLERK
Per [Signature]
Deputy Clerk

I. Previous Lawsuits

- A. If you have filed any other lawsuits in federal court while a prisoner please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

Jervis LAVERN Goodrich V. CLINTON COUNTY PRISON

CASE NO: 1:03-CV-1469

Judge Rambo 3rd cir.

II. Exhaustion of Administrative Remedies

- A. Is there a grievance procedure available at your institution?

 Yes No

- B. Have you filed a grievance concerning the facts relating to this complaint?

 Yes X No

If your answer is no, explain why not I HAD TO AWAIT A RULING
FROM A JUDGE TO PROVE AND SUPPORT THE VIOLATIONS STATED.

- C. Is the grievance process completed? Yes No

III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use Item B for the names, positions and places of employment of any additional defendants.)

- A. Defendant Trooper Stephen Wilcox is employed
as PA STATE Trooper at 712 Tenth St. Mill Hall PA 17757.
- B. Additional defendants Trooper Wilcox's partner Christopher Soo
also stationed at The Lamar Berricks in Mill Hall.

IV. Statement of Claim

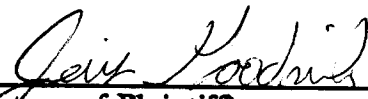
(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

1. SEE ATTACHED STATEMENT NO. #1
2 Pages
2. SEE ATTACHED COMPLAINT #2
7 Pages
3. SEE ATTACHED NOTARIZED AFFIDAVIT
1.

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)


1. I will seek punitive, monetary, compensatory
DAMAGES AND EMOTIONAL / MENTAL ANGUISH
FOR INCARCERATION FOR THE PAST TWO YEARS
WHICH STEMMED FROM THE ILLEGAL STOP & SEARCH
2. I will leave the damage's open for
DISCUSSION, simply because I expect
TO ADD TWO MORE STATE TROOPERS AND
CLINTON COUNTIES DISTRICT ATTORNEY.
3. AS PREVIOUSLY MENTIONED, THE PROSECUTORIAL MISCONDUCT
THAT TED MCKNIGHT HAD USED, ALONG WITH THESE TROOPERS
INVOLVED, WAS OF VARIOUS TYPES OF STATE & FEDERAL
MISCONDUCT, WHICH HE AND THE FEDS, CONTINUE TO INFLECT
ON ME. I STATED ABOVE I WOULD LEAVE DAMAGES OPEN, HOWEVER
2 YEARS OF JAIL AND CONTINUOUS TORMENT, BRINGS ME TO THE
AMOUNT OF \$500,000 (Five Hundred ^{thousand} Dollars) AMENDMENTS WILL BE
FILED FOR THE OTHERS AT A LATER DATE.

Signed this 12TH day of JULY, 2004


(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

7-12-04
(Date)


(Signature of Plaintiff)

#1.
STATEMENT

PLEASE TAKE NOTICE THAT I JERVIS
LAVERN GOODRICH PETITIONER AND PLAINTIFF
IN THIS MATTER IS FILING A STATEMENT AND
COMPLAINT AGAINST TWO PENNSYLVANIA
STATE TROOPERS, WHO ARE LISTED AS FOLLOWS:

STATE TROOPER. STEPHEN WILCOX

Badge NO.

7910

STATE TROOPER. CHRISTOPHER SOO

Badge NO.

7649

BOTH TROOPERS ARE STATIONED AT
THE LAMAR BERRICKS LOCATED ON 712
TENTH STREET, MILL HALL PENNSYLVANIA
17757. THE PLAINTIFF IS INCARCERATED AT
THE SNYDER COUNTY PRISON, 600 OLD COLONY
ROAD, SELINS GROVE PA 17870. PLAINTIFF IS

Filing under 42 U.S.C. SECTION 1983 AND IS PRO SE. ON SEPTEMBER 10TH 2002, Trooper Wilcox AND HIS PARTNER Trooper Soo, made AN UNLAWFUL INVESTIGATORY STOP OF AN AUTOMOBILE AT A 11:19^{PM} IN THE EVENING. DURING THAT TIME THE OCCUPANTS OF THE VEHICAL, MRS MALISSA KINNE (DRIVER) HER FIANCEE AT THE TIME JERVIS GOODRICH (PASSANGER) AND PLAINTIFF IN THIS CASE, WERE NOT IN ANY WAY VIOLATING ANY VEHICAL CODES OR BREAKING THE LAW. DUE TO THE ILLEGAL STOP BY Trooper Wilcox AND Trooper Soo, WE WERE LATER SUBJECTED TO AN ILLEGAL SEARCH AND SEIZER, FALSE ARREST, HARRASMENT AND ILLEGAL INCARCERATION. MRS KINNE AND I WERE NEVER GIVEN OUR AMANDA RIGHTS AND WERE SUBJECTED TO FOURTH AND FIFTH AMENDMENT VIOLATIONS. THIS KIND OF POLICE MISCONDUCT IS UNCONSTITUTIONAL AND MUST NOT BE IGNORED

Jervis Goodrich
PLAINTIFF'S SIGNATURE

7-12-04
DATE

2.

COMPLAINT

THIS INCIDENT TOOK PLACE IN MILL HALL, PA. IT WAS A 11:19 PM IN THE EVENING WHEN, AT THE TIME, MY FIANCEE MRS KINNE AND MYSELF WERE TRAVELING DOWN AGNEW STREET, IN MILL HALL, WE WERE OBEYING ALL TRAFFIC CODES AND BRACING NO LAWS, AS WE WERE HEADING DOWN AGNEW STREET, PLANNING TO TURN ON TO PENNSYLVANIA AVENUE AT THE INTERSECTION, WHEN OUT OF NO WHERE AN UNIDENTIFIED VEHICAL TURNED UP AGNEW STREET, AFTER ALMOST PASSING THE STREET ITSELF. THE VEHICAL BACKED UP, THEN BEGAN TRAVELING TOWARDS US AT A GOOD PACE. WE THOUGHT NOTHING OF IT AND CONTINUED TOWARDS THE UNIDENTIFIED VEHICAL. AT THE POINT WHEN BOTH VEHICALS WERE ABOUT (15) FEET FROM EACH OTHER, THE VEHICAL COMING AT US FOR KNOW APPARANT REASON PULLED RIGHT IN OUR LANE CAUSING MRS KINNE TO SLAM ON HER BRAKES AND SCREAM. I HAD MY FEET UP ON THE DASH AND BRACING MYSELF WHEN BOTH VEHICALS CAME TO A HAULT. THEN LIGHTS BEGAN TO FLASH ON THE OTHER VEHICAL. MRS KINNE AND MYSELF WERE IN SHOCK AND BECAME FURIOUS, THAT A STATE-TROOPER WOULD ACTUALLY MAKE AN UNREASONABLE AND ERRATIC NOSE TO NOSE VEHICAL STOP IN THE MIDDLE OF THE NIGHT FOR ABSOLUTELY NO REASON OTHER THEN FORCING OUR VEHICAL TO STOP OR HIT HEAD ON. THERE WERE TWO

STATE TROOPERS getting out of Their car, when Mrs KINNE Rolled Down Her window Trooper Soo approached Mrs KINNE's window which she Angerly said "what in the world is going" Trooper Soo started A SHORT EXPLANATION AS TO why we were stopped. He continued by saying that they Had recieved A call From someone, who saw two people walking Through A CLAY YARD or FACTORY carrying TANKS And placing Them in The Trunk of A DARK colored Uehical. AT THAT point Mrs KINNE interrupted Trooper Soo, and informed Him that we had just seen two women in A DARK grayish car take off minutes Ago like A BAT of Hell. Trooper Soo asked where they tore out of. Mrs KINNE replied, From A TURN AROUND A The end of The street. By This time A Third STATE Trooper pulled up behind us Boxing us in. Trooper Soo ordered us to STAY PUT. Then He took off on Foot in The Direction we came From, when He returned He ASKED us Both to STEP OUT of our car, we did AS He ASKED, we gave Him our NAMES AND our Addresse's. The we returned to our car. where we SAT For FounTy minutes. we had no idea what was going on and we were Told NOTHING Except TO wait. Then Trooper Wilcox ASKED me to STEP OUT of The car For The second time. I did AS He ASKED.

HE THEN ASKED ME ABOUT A WARRANT OUT OF TIoga COUNTY NY, AT THE TIME I KNEW NOTHING ABOUT ANY WARRANTS FROM NYS. I THEN ASKED WHY I WAS WANTED, HE SAID A PAROLE VIOLATION, FAILURE TO APPEAR. AND WE'RE WAITING TO SEE IF THERE GOING TO EXTRADITE. ONCE AGAIN I RETURNED TO OUR CAR. WHERE I BEGAN TO TELL MRS KINNE WHAT TROOPER WILCOX SAID ABOUT THE WARRANT. FINALLY ABOUT AN HOUR AND HALF LATER TROOPER SOO, TOLD ME THAT TIoga COUNTY WANTS ME HELD AND I WAS UNDER ARREST FOR FUGITIVE FROM JUSTICE, MRS KINNE AND I KNEW THIS WAS NOT TRUE. THEIRS TWO REASONS WHY (A) I WAS NEVER CONTACTED BY TIoga COUNTY PRIOR TO THIS INCIDENT ABOUT ANY COURT PROCEEDINGS AND (B) I NEVER TO THIS DAY BEEN ON PAROLE OR PROBATION IN TIoga COUNTY NY, OR IN ANY COUNTY OF NEW YORK. I DID OWE A ONE YEAR FLAT SENTENCE FOR BAD CHECKS BACK IN 1998, I WAS TO PAY THE CHECKS BACK, WHICH I'VE NOT DONE. AND THE WARRANT IS BECAUSE OF THAT. BUT I CONTACTED TIoga COUNTY AND I LEARNED THE WARRANT IS NON - EXTRADITABLE. SO THE TROOPERS HAD NO RIGHT ARRESTING ME ON THAT WARRANT. THEY DID ANYWAY. WHICH GAVE THEM TIME TO ILLEGALLY RUMMAGE FOR EVIDENCE WHY ME AND MRS KINNE, SAT CLUELESS AS TO WHAT WAS GOING TO HAPPEN TO US. WHILE I WAS TALKING TO TROOPER SOO, MRS KINNE STILL IN THE CAR CRIED OUT MY NAME "JERRY WHAT IS HE DOING", I LOOKED IN

Through The open passengers window where mrs Kinne WAS SEATED, I SAW Trooper Wilcox under Her SEAT WITH HIS FLASHLIGHT, I ordered Trooper Wilcox OUT OF The vehICAL AND Told Him He CAN'T DO THAT, He GOT UP AND STEPPED AWAY FROM The CAR AND mrs Kinne closed Her Door, Then I WAS ASKED by Trooper TO STEP OVER TO There cruiser, I ASKED mrs Kinne TO come WITH me becuse she WAS SCARED AND crying. ONCE we GOT OVER TO Their cruiser. Trooper Wilcox PLACED me under ARREST AND PUT me in The cruiser, According TO Trooper SOO, I WAS Being ARRESTED For theft AND The WARRANT, Nobody read me my AMANDA Rights OR Told me WHAT I supposedly STOLE, mrs Kinne WAS STANDING NEXT TO Trooper SOO, while SEVERAL OTHER Troopers INCLUDING Trooper Wilcox, TRASHED The inside of our vehICAL Through The open windows. They went Through our clothing, The glove Box, Tried TO pull ON The back SEAT SO They could TRY AND GET INTO The TRUNK THAT way. AFTER The Troopers Rummaged Through The inside of our CAR AND Found NO sign OF Evidence OR criminal ACTIVITY, I Told mrs Kinne TO get BACK in our CAR AND STAY put she did, By This Time Trooper DAVY AND Trooper PATTERSON Arrived. AT THAT Time These officers made SEVERAL Trips ON FOOT up AND Down Agnew STREET AND They Kept Looking AT The TRUNK Lid OF our vehICAL.

Mrs Kinne was watching them in her rear view mirror and remained totally confused as I was. What the Troopers were doing made no sense at all, then Trooper Wilcox approached Mrs Kinne's open window and asked her to step out of the car. This was her second time getting out of the car. Trooper Patterson made the decision to arrest Mrs Kinne on theft charges, she began to cry and asked the Troopers what it was that she supposedly stole and from who. They said we don't know yet. Trooper Wilcox placed hand cuffs on her and Trooper Soo went down the right side of Mrs Kinne's underwear for the trunk key. Mrs Kinne had put that key there because we told the Troopers, we did not want them searching the trunk or the car itself, even though they had already trashed the car they wouldn't take no for an answer about searching the trunk. So Mrs Kinne hid the key on her person. So they just took the key from her. As Trooper Wilcox was placing Mrs Kinne in the cruiser he stepped on her right ankle and drew blood, she began to cry and I was completely furious that this Trooper was treating us so cruelly, we did nothing to warrant this kind of treatment. The Troopers still would not tell us anything to explain their illegal conduct. None did they read Mrs Kinne her Amanda rights. I told Trooper Soo that I

HAD LEGAL DOCUMENTS FROM NEW YORK STATE DATED SEPTEMBER 5TH 2002, STATING I HAD NO WARRANTS AS OF THAT DATE. TROOPER 500, SAID CAN SOMEONE BRING THOSE DOCUMENTS TO THE BERRICKS, I SAID YES. AT THAT POINT TROOPER 500, GAVE CORPORAL TODD BRIAN THE KEYS THAT HE HAD TAKEN FROM MRS KINNE, I WAS SEATED IN TROOPER WILCOX'S CRUISER AND KINNE WAS IN CORPORAL BRIAN'S, WE WERE GETTING READY TO LEAVE FOR THE BERRICKS, WHEN CORPORAL TODD BRIAN HANDED OFF THE TRUNK KEY TO TROOPER RICHARD DAVY, WHO STAYED AT THE SCENE WITH TROOPER KEVIN PATTERSON AND TROOPER DAVID KIRKENDALL. AS WE PULLED AWAY MRS KINNE WAS LOOKING BACK AT OUR CAR AND TOLD ME LATER AT THE STATION THAT SHE SAW THE TRUNK LID COME UP AS WE WERE PULLING AWAY. I KNEW THAT EVEN THOUGH WE TOLD THE TROOPERS THEY COULDN'T SEARCH THE ENTIRE CAR WITH OUT A WARRANT, THEY'RE "SO WHAT" ATTITUDES ANGERED US EVEN MORE. AFTER WE WERE TAKEN TO THE LAMAR BERRICKS AND CHAINED TO THE FLOOR LIKE DOGS, WE BEGGED FOR A PHONE CALL, THEY WOULDN'T LET US USE THE PHONE UNTILL SOME 3 HOURS LATER. MRS KINNE CALLED HER SON AND EXPLAINED WHAT THE TROOPERS HAD DONE TO US, AND ASKED HIM TO BRING DOWN THE LEGAL DOCUMENTS CONCERNING THIS SO CALLED WARRANT OUT OF NYS. TWO HOURS LATER KINNE'S SON HAD ARRIVED AT THE BERRICKS WITH THE LEGAL

DOCUMENTS, The Troopers Refused The Documents They wouldn't even let us see Him. FIANALLY AROUND 7:00AM we were TAKEN TO MAGISTRATE MAGG'S OFFICE AND GIVEN \$75,000.00 DOLLAR BAIL AND TAKEN TO JAIL, CLINTON COUNTY PRISON. FROM THAT DAY SEPTEMBER 11TH 2002, THE PLAINTIFF HAS BEEN JAILED TO THE PRESENT. ALSO THEIR WILL BE AMENDMENTS ADDED TO THIS COMPLAINT CONCERNING SEVERAL OTHER TROOPERS THAT WERE INVOLVED AND A IN DEPTH COMPLAINT ABOUT CLINTON COUNTIES DISTRICT ATTORNEY TED MCKNIGHT WHO FOR SEVEN MONTHS CORRUPTED AND TAINTED MY CASE AND THEN PUSHED THE CASE INTO THE FEDERAL SYSTEM SO THAT THERE WAS NO WAY I COULD HAVE THE OPPORTUNITY FOR FULL AND FAIR LITIGATION IN STATE COURT. FOR HE KNEW HE TAINTED THE CASE. THIS COMPLAINT IS ONLY THE BEGINNING TO ALL WHO'S INVOLVED. WHAT THE TROOPERS AND THE DA HAVE DONE TO ME IS UNCONSTITUTIONAL

Jeris Moody
SIGNATURE PLAINTIFF

7-12-04
DATE

AFFIDAVIT

I Jervis LAVERN GOODRICH, HEREBY CERTIFY THAT THE INFORMATION HERE IN THE STATEMENT AND COMPLAINT AGAINST PENNSYLVANIA STATE TROOPERS, STEPHEN WILCOX AND HIS PARTNER CHRISTOPHER SCO, ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND ABILITY. ALSO ON THIS 12TH DAY OF JULY 2004, I VERIFY THAT I AM IN POSSESSION OF A MEMORANDUM AND ORDER DATED APRIL 29, 2004, WHERE THE HONORABLE JUDGE JONES HAS RULED THAT THE INVESTIGATORY (TERRY STOP) WAS IN FACT ILLEGAL AND FOUND THE SEARCH OF THE VEHICAL INVAILED, WHICH GIVES THE FOREGOING STATEMENT AND COMPLAINT MERIT UNDER 42 U.S.C. SECTION 1983, (GOVERNMENT PROTECTION OF THE CONSTITUTIONAL VIOLATIONS) SHALL BE SUMMONDS IN THIS CASE.

7-12-04

Jervis Goodrich
PLAINTIFF SIGNATURE

Sylvia C. Brown

Notarial Seal
Sylvia C. Brown, Notary Public
Penn Twp., Snyder County
My Commission Expires Oct. 31, 2005

Member, Pennsylvania Association Of Notaries

7-12-04
DATE

3-00444

wyder county prison
old colony Rd.

Kingsgrove, PA 17820

Clerk of Courts

U.S. District Court House

228- Walnut Street

P.O. Box 983

Harrisburg, PA 17108

